

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

February 12, 2022

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722

Re: AA Medical P.C. v. Almansoori
Case No.: 2:20-cv-3852 (DG) (JMW)
MLLG File No.: 7-2022

Dear Judge Wicks:

This firm represents the Plaintiff in the above-referenced case.

Plaintiff writes to respectfully request reconsideration of the Court's February 10, 2022 Order granting Plaintiff's prior letter motion to adjourn the conference for oral argument and rescheduling same to March 2, 2022 at 9:00 AM. See Text Only Order granting Docket Entry 57 dated February 10, 2022.

The standard for granting a motion for reconsideration is strict, and will generally be denied unless the moving party can point to controlling decisions *or data* that the court overlooked—matters, in other words, that might reasonably be expected to alter the conclusion reached by the court. See Shrader v. CSX Transp., Inc., 70 F.3d 255, 257 (2d Cir. 1995) (emphasis added).

In Plaintiff's prior letter motion to adjourn, Plaintiff provided the parties' availability on: (i) February 22, 2022 in the late afternoon; (ii) any time on March 1, 2022; or (iii) March 2, 2022 *in the late afternoon*. See Docket Entry 57 (emphasis added). Because your undersigned is scheduled to appear in Court in person on the morning of March 2, 2022, Plaintiff respectfully seeks, with Defendant's consent, reconsideration of this Court's February 10, 2022 Order to reschedule oral argument to a time that both parties are available.

Plaintiff has conferred with Defendant and the parties remain available in the late afternoon on March 2, 2022 (after 1:00 PM) and in the late afternoon on February 22, 2022. Defendant is no longer available at any time on March 1, 2022.

Plaintiff thanks this Court for its time and attention to this case.

Dated: Lake Success, New York
February 12, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s

Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com

VIA ECF

All counsel of record